

### **REMARKS/ARGUMENTS**

The Applicant thanks the Examiner for the comments in the Office Action which has been carefully considered. It is respectfully submitted that all issues raised are traversed, being hereinafter addressed with reference to the relevant headings appearing in the Detailed Action section of the Office Action.

The Applicant has amended the claim set. The Applicant respectfully submits that the amendments to the claim set are fully supported by the originally filed specification.

Claims 1 and 11 have been amended to include the features of claims 8 and 9. Claim 8 has been consequently cancelled from the application.

#### ***Double Patenting***

Claims 1 to 11 have been rejected on the ground of non-statutory obviousness-type double patenting as being unpatentable over claims 1 to 11 of U.S. Patent No. 6,857,724. In respect of this objection, the Applicant submits a terminal disclaimer.

#### ***Claim Rejections – 35 USC § 103***

Claims 1 to 5, 8, and 11 are rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Matsumoto *et al.* (US 6,467,870).

The Applicant respectfully submits that the present claims are patentable over Matsumoto.

In particular, claim 1 is directed towards a print assembly for a wide format printer. The Applicant respectfully draws the Examiner's attention to page 19, lines 1 to 11 of the present application, where the Applicant draws distinctions between wide format printers and thermal and piezoelectric printheads. In contrast to the present claim 1, Matsumoto is primarily concerned with implementing recording heads for ink jet printers (see column 13, lines 45 to 50). The Applicant fails to see any description in Matsumoto that the system of Matsumoto will be suitable for wide format printers.

Additionally, the Examiner has stated that although Matsumoto does not expressly disclosed the claimed number of nozzle arrangements, it would have been obvious to one having ordinary skill in the art at the time the invention was made to provide the claimed number of nozzle arrangements. In particular, the Examiner believes that the reason for performing the modification would have been to select the number of nozzle arrangements and printhead chips to provide the desired size, number of pixels and resolution. The Applicant respectfully disagrees with the Examiner.

In particular, the present number of nozzle arrangements in claim 1, that is, at least fifty thousand nozzle arrangements, is not a trivial feature of the claim. The Applicant refers the Examiner to page 11, lines 25 to 30 of the present application where the Applicant describes that it is the features of the present printhead chip as described in claim 1 that can allow for up to eighty-four thousand nozzle arrangements. It follows, by using the printhead chips of the present application, it is possible for the printhead assembly to have over as many as two hundred thousand nozzle arrangements. It would be appreciated that in printing technology the number of nozzle arrangements that are able to be included in a printhead can affect printing quality. The Applicant respectfully refers the Examiner to MPEP section 2143.03, where it is required in order for obviousness to be established, for the cited references to suggest or teach all of the claim recitations.

Thus, the Applicant respectfully submits that the features in claim 1 are not trivial and that unless shown in the prior art references, claim 1 is inventive over Matsumoto.

In any event, in order to further distinguish the present application over the cited art, the Applicant has amended claim 1 to include the features of claims 8 or 9. Thus, claim 1 now includes the print assembly including a plurality of printhead modules, each printhead module incorporating a printhead chip, the printhead modules being mounted on the carrier, wherein a flexible printer circuit board (PCB) is mounted on each printhead module.

The Applicant fails to see the features of amended claim 1 in any of the cited references. Thus, the Applicant respectfully submits that the present amended claim 1 is patentable over the cited references.

In view of the foregoing, it is respectfully submitted that the present application is believed to be in condition for allowance. Accordingly, the Applicant requests a Notice of Allowance of all the claims presently under examination.

Very respectfully,

Applicant:



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